

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

Zurich American Insurance Company

Plaintiff,

vs.

Asphalt Paving Systems, Inc.

Defendant.

Civil Action No.:

1:22-cv-01535-CPO-MJS

**[PROPOSED] ORDER ON JOINT
MOTION TO EXTEND CASE
MANAGEMENT DEADLINES**

This matter coming to be heard on the Joint Motion to Extend Case Management Deadlines submitted by Plaintiff Zurich American Insurance Company (“Zurich”) and Defendant Asphalt Paving Systems, Inc. (“Asphalt”), good cause having been shown, the Court extends the remaining case management deadlines set in the Scheduling Order (ECF No. 42) as follows:

	Current Deadline	New Deadline
Pretrial factual discovery	November 30, 2023	January 30, 2024
Plaintiff’s expert disclosures	December 15, 2023	February 15, 2024
Defendant’s expert disclosures	January 15, 2024	March 15, 2024
Expert depositions	February 16, 2024	April 16, 2024
Dispositive motions	March 15, 2024	May 15, 2024

All other terms of the Scheduling Order remain in full force and effect.

ENTERED BY: _____

DATED:

JOINTLY SUBMITTED BY:

PLAINTIFF

/s/ Christopher B. Fontenelli

Christopher B. Fontenelli (082532014)
LOCKE LORD LLP
One Gateway Center
Newark, NJ 07102
T: 973-520-2300
cfontenelli@lockelord.com

Steven T. Whitmer (*pro hac vice*)
Julie L. Young (*pro hac vice*)
Hannah M. Oswald (*pro hac vice*)
LOCKE LORD LLP
111 South Wacker Drive
Chicago, IL 60606
T: 312-443-0254
swhitmer@lockelord.com
jyoung@lockelord.com
hannah.oswald@lockelord.com

*Attorneys for Plaintiff Zurich American
Insurance Company*

DEFENDANT

/s/ Amanda Szmuc

John F. Palladino (042771989)
Colin G. Bell (018552005)
Amanda Szmuc (409552022)
HANKIN SANDMAN PALLADINO
WEINTROB & BELL, P.C.
30 S. New York Avenue
Atlantic City, NJ 08401
T: 609-344-5161
john@hankinsandman.com
coling@hankinsandman.com
amandas-h@hankinsandman.com

*Attorneys for Defendant Asphalt Paving
Systems, Inc.*